

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
L-15-0443/415	CommuneE	10-19-15

COMMENTS:

ORIGINAL

DOES NOT CONTAIN CBI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

ML54148

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2015 OCT 19 PM 1:32

OCT 16 2015

CONTAINS NO
CBI

Paul Hewitt
President - The Americas
Tracerco
4106 New West Drive
Pasadena TX 77507

Re: LVE L-15-0443, 4, & 5

Dear Mr. Hewitt:

This letter responds to the above-referenced Low Volume Exemption (LVE) notices, for Perfluoro(1,3-diethylcyclohexane) (bound at 1000 kg/year), Perfluoro(2,3-dimethylbutane) (bound at 1000 kg/year) and Perfluoro-2-methylpentane (bound at 1000 kg/year) received by the Environmental Protection Agency (EPA) on 2015-09-24. The notice review period expires on 2015-10-23. After that date, you will be free to manufacture or import these substances under the terms of the Low Volume Exemption Rule at 40 CFR 723.50.

However, EPA is concerned that release to the environment of the LVE substance during manufacturing, processing, or use could contribute to global warming. Specifically, EPA is concerned, based on experience with on similar materials, that the LVE substance may cause greenhouse effects.

EPA has nevertheless approved this LVE due to the exposure limitations provided in your notice. 40 CFR 723.50(j) requires that the LVE substance "must be manufactured at the site or sites described, for the uses described, and under the human exposure and environmental release controls described in the exemption notice". Therefore, to mitigate potentially damaging releases, we have conditioned our approval of your applications on use of no more than the volume you have identified in the

application for each of your materials, and we suggest that you note at section 12.6 in your MSDS that the material is expected to have a high global warming potential.

Further, 40 CFR 723.50(k) requires your Company to notify processors and industrial users of the exposure controls and use limitations specified in the exemption notice. If you learn that a customer is processing or using the substance in violation of such restrictions, you must immediately cease distribution of the LVE substance to that customer or comply with the procedures specified in subsection 723.50(k)(3).

Thank you for your cooperation. If you have any questions or comments, please contact Dave Schutz, the Program Manager for this LVE, at (202) 564-9262.

Sincerely,

A handwritten signature in cursive script, appearing to read "Greg Schweer for".

Greg Schweer, Chief
New Chemicals Management Branch
Chemical Control Division (7405 M)